



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION 2
290 BROADWAY
NEW YORK, NY 10007-1866

September 25, 2003

Mr. Jeffrey A. Leed, President
Leed Environmental, Inc.
124 Deborah Drive
Reading, PA 19610

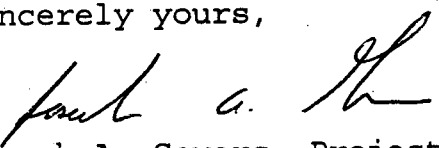
Dear Mr. Leed:

The U.S. Environmental Protection Agency (EPA) has completed its review of the April 23, 2003 Groundwater Monitoring Plan (Plan) for the NL Industries, Inc. Superfund Site (Site), located in Pedricktown, New Jersey. The Plan was prepared by Construction Services International, Inc. for the Interim Pedricktown Site Group to evaluate current groundwater quality at the Site.

EPA's comments on the Plan are attached to this letter. EPA's comments should be fully addressed in a revised Plan, to be submitted to EPA within twenty-one (21) calendar days of the date of this letter.

If you have any questions regarding the attached comments, please call.

Sincerely yours,


Joseph A. Gowers, Project Manager
Southern New Jersey Remediation Section

Attachment

cc: P. Harvey, NJDEP

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**U.S. ENVIRONMENTAL PROTECTION AGENCY COMMENTS ON THE
GROUNDWATER MONITORING PLAN FOR THE
NL INDUSTRIES, INC. SUPERFUND SITE**

1.- Page 2, Third Full Paragraph

It is indicated in this paragraph that well MW-27, and other wells which may also have been damaged by disturbing the bentonite seal, will be evaluated by using turbidity and other parameters to determine if the wells need to be abandoned. EPA does not believe that this method is a reliable way of determining the integrity of the well seal. Any well that was hit or just bumped by vehicles or heavy machinery has likely had its bentonite seal disturbed. Therefore, any well hit by vehicles or machinery should be abandoned. Furthermore, these wells should be replaced if they were sampled during the 1998-1999 sampling event.

2.- Page 3, First Full Sentence

This paragraph states that CSI will collect groundwater samples from monitoring wells last sampled in 1999, where possible. Any wells that were sampled in 1998-1999 and have been damaged or abandoned must be replaced. Furthermore, samples from these replacement wells should be collected as part of the next groundwater sampling event.

3.- Page 3, First Full Paragraph

EPA has determined that potable wells in the vicinity of the site should be resampled as part of the upcoming groundwater sampling event, given the detection of lead in residential wells during the 1998-1999 sampling event. At a minimum, potable wells sampled during the 1998-1999 event should be resampled.

4.- Page 3, Third Full Paragraph

As indicated in EPA's April 18, 2003 e-mail message to Dustin Ferris of CSI, CLP Method OLC03.2 should be utilized for analysis of groundwater samples for low-level volatile organic compounds. Furthermore, either CLP Method ILM04.1 or ILM05.2 is acceptable for the analysis of groundwater for lead and cadmium. ILM04.1 is acceptable if the laboratory cannot yet meet the requirements of ILM05.2.

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EMERGENCY & REMEDIAL RESPONSE DIVISION

DATE

9/25/03

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COMMENTS:

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